

**UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND
BALTIMORE DIVISION**

CRYSTAL BLANKENSHIP,	§	
	§	
Plaintiff,	§	
	§	
v.	§	Case No. 1:13-cv-02522-ELH
	§	
BLACK & DECKER (U.S.) INC. and THE	§	
BLACK & DECKER CORPORATION,	§	
701 E. Joppa Road, Towson,	§	JURY TRIAL DEMANDED
(Baltimore County) Maryland 21286,	§	
	§	
Defendants	§	

JOINT REQUEST TO MODIFY THE SCHEDULING ORDER

The parties respectfully request that the Court modify the current scheduling order (Dkt 7) to generally extend by 120 days the current deadlines and to modify the expert disclosure deadlines. The parties respectfully submit that such an extension is appropriate because it is likely that that discovery could be voluminous and expert-intensive. Plaintiff's allegations span more than a decade and Plaintiff intends to seek discovery on a wide range of issues. Defendants do not agree with Plaintiff's proposed scope of discovery but agree that additional time would be helpful to permit the parties to attempt to work out their issues with discovery. Additional time would also permit Plaintiff's experts to obtain and review documents from Defendants, something that is impossible under the current scheduling order.

For all of the reasons set forth above, the parties request that the Court enter a new scheduling order setting the following deadlines:

March 3, 2014	Moving for joinder of additional parties and amendment of pleadings
March 17, 2014	Plaintiff's Rule 26(a)(2) disclosures
April 28, 2014	Defendant's Rule 26(a)(2) disclosures
May 12, 2014	Plaintiff's rebuttal Rule 26(a) (2) disclosures
May 19, 2014	Rule 26(e)(2) supplementation of disclosures and responses
May 29, 2014	Discovery deadline; submission of status report
June 5, 2014	Request for Admission
June 30, 2014	Dispositive pretrial motions deadline

DATED this the 9th day of October, 2013.

Respectfully submitted,

/s/ Robert K. Jenner

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CERTIFICATE OF SERVICE

I hereby certify that on October 9th, 2013, a copy of the foregoing document was electronically filed. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Robert K. Jenner